

Behr PRP Teleconference for Additional VI Sampling Needs

December 8, 2016

Mahle: Jim Hunt; Bill Huston; Boris Nodel; Phil Lawrence
 Leslie Williams - **OEPA**
 Ron Roelker - **AECOM**
 Erik Hardin - **USEPA**

Bill - main comment is about the additional EPA requested work north of Stanley Street.

Erik - this is just a reckoning of things we knew was coming.

Bill - do we and AECOM have this information?

Erik - we provided maps from the Draft RI Report, was sent to Boris.

Ron - we got the PDF of the maps, yes.

Erik - one map has actual GW data on it.

Boris - Erik, can you go over the request?

Erik - okay, the source of this information is from looking at the GW data and plume in the RI report. And comparing that to the VI things completed to date. Also note that we are now trying to compile all of this historic VI data into one single database. The main areas of additional VI work so far appears to be to the northeast and a little more to the west.

Bill - in that northern area, there is at least one property that has some kind of a GW issue. They are doing monitoring. Right? Janey Road area.

Leslie - you mean DAP?

Bill - no, Gayston.

Leslie - not sure if they have active remediation but we have been looking at DAP And Gem City. But the data was low concentrations.

Bill - Gayton was low data back then too.

Erik - as far as you know that was just GW monitoring?

Leslie - yes. DAP had a P&T system for a while, but not sure what happened to that.

Boris - we need to talk about things coming their way. I told Erik earlier that GW contours are pushing the plume towards the SW. So stuff is coming to Behr from the NE. And since there are elevated levels at Gem City, did Gem City settle the case with EPA?

Leslie - I don't know. They are listed as a PRP.

Boris - regionally, when USEPA first got involved, in 2003 or 2004, all the PRPs were brought into Behr to come up with a common understanding. Became clear Gem City and Aramark had attorneys and had no interest in partnering with Chrysler, and would claim the inability to pay. I do not know if those two people settled. Who is in the hook? My intention is to drill on the eastern border of the Behr property and install a barrier to prevent onsite migration if we see elevated concentrations. Similar to the south side.

Erik - let's talk before you install any GW barriers. A vapor barrier is one thing, but this is more.

Boris - of course, we would do that.

Erik - the highest concentrations are still in the AS/SVE area. But in terms of coming onto the property from the NE, that's another discussion. It looks like this onsite migration could dilute things and help you.

Bill - right, that could be. But we need a better understanding what the conditions really are.

Boris - also please look at the historical data.

Leslie - yes, and we've been sharing that data to USEPA.

Phil - how far back does that go?

Leslie - not sure, will look.

Bill - anything from the late 1990's would be interesting.

Boris – you must understand that Mahle cannot be the sole party on the hook.

Erik – it's a process, looking at new PRPs. We did not get a resolution with these two parties. There are other options for cost recovery after the fact as well. There are many different methods to do this.

Boris – did they settle or not?

Erik – not that I know, but I would not be given information like that. It doesn't work like that.

Bill – that original group meeting Boris described was an attempt to make a PRP Group. Chrysler tried to take the lead with other people supporting, but neither Gem City nor Aramark wanted to volunteer. So Chrysler tried to move ahead due to the due date on the EPA requirements.

Boris – I need to emphasize that we've been nothing but cooperative this entire time. Unfortunately, USEPA never expressed interest in going after other PRPs. I cannot explain this to my management, which I am cleaning up other people's mess.

Leslie – I just emailed the results, going back to 1996. Generally around 100-ppb and less.

Ron – any soil gas?

Leslie – no. And just from RW-1.

Boris – we brought up Hohman Plating several times. Do you know of any releases?

Leslie – no. We even asked the air permitters, and we didn't find anything. Neither did Hazardous Waste section.

Erik – adding PRP's is in the next step. After the investigation is completed, then we work on a decision document for an RD/RA and then bring in any and all PRPs for negotiation to lead that. If we have sufficient evidence. We don't do this during the investigation.

Boris – okay.

Erik – as a separate action there's the NTCRA which is focused on the southern edge which is all from Mahle (former Chrysler operations). For the VI, that's what I sent an email and not a formal letter. We are giving you an opportunity look into this and volunteer efforts. Otherwise, I need to get support to have other places tested for investigation. We are trying to do that as quickly as the process allows. If we do that now, then you (Mahle) would end up getting billed for it under cost recovery.

Boris – okay, but I cannot defend to management investigating outside the order from 2009.

Erik – that order speculated on where things were at the time, and was kept open ended. That being said, we are asking to look at this now as opposed to just making an order now. EPA does understand there are concentrations upgradient.

Phil – that was the reason for this call, to understand all of this. We cannot make a response on this call today, we have to meet with management. We may want to do some investigation on our own to make decisions. Is there a time element for our response?

Erik – not officially. The critical thing is if I need to get our support spun up for VI sampling support or not, to address these additional areas on the maps. But if Mahle investigates it, then I don't need to do that.

Phil – with the holidays it would be tougher, but we will have discussions as soon as we can. May not be before end of year.

Erik – understood. Let's regroup early January as needed to see where if anywhere Mahle is willing to sample. I cannot put this on hold too long – either Mahle does this or some of this, or EPA has to do it.

Leslie – just ask for any data you want to see.